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**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN MARIANA ISLANDS**

JOSHUA GRAY,

**Plaintiffs,**

**v.**

IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC,

**Defendant**

Case No. 1:19-cv-00008

**DECLARATION OF HOWYO CHI  
ISO DEFENDANT'S RESPONSE TO  
ORDER TO SHOW CAUSE AGAINST  
IPI AND HOWYO CHI**

Hearing Date: April 30, 2024  
Hearing Time: 10:00 AM  
Judge: Hon. Ramona V. Manglona

1. I am over the age of eighteen, competent to make this declaration, and all statements made in this declaration are based on my personal knowledge unless specifically indicated otherwise.
2. At all times relevant to this matter, I was and still is employed by IPI (CNMI) LLC. (Hereinafter referred to as "IPI"). I currently serve as the executive director of IPI.

3. Mr. Craney of Clear Management has never discussed any concerns with me about a lack of security guards on duty. He also hasn't mentioned any issues with the security protocols at the casino or the "Right Door" situation, despite knowing that I oversee security at the casino and that the security guards report to me.
4. Since the closure of casino operations in March 2020, IPI has had very limited resources and no income. To maintain security at Imperial Pacific Resort, IPI has been borrowing funds to pay the current security guards.
5. IPI received quotations from IPWAN security at \$8.25 USD per hour for the security guard, it would cost at least \$47,520 USD to hire eight security guards 24/7 for 30 days.
6. Given the pending casino license revocation hearing against IPI, it is virtual impossible for IPI to find a lender who is willing to extend credit to IPI.
7. Although I am the executive director of IPI, I have no fund under my control to pay for the security to secure the liquor that was taken away by Clear Management.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Saipan, Commonwealth of the Northern Mariana Islands on the 16th day of April, 2024.

X: \_\_\_\_\_/s/\_\_\_\_\_

Howyo Chi